

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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In Re:

JUDITH CARR,

Debtor.

Case No.: 23-17710

Chapter 11

Judge: Hon. Christine M. Gravelle

**NOTICE OF MOTION PURSUANT TO SECTIONS 105(A) AND 506(A) AND (D)
OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3007 FOR AN ORDER
RECLASSIFYING THE CLAIM OF JERSEY SHORE ANESTHESIOLOGY
ASSOCIATES FROM SECURED TO UNSECURED**

PLEASE TAKE NOTICE that, the undersigned attorneys for Judith Carr, the debtor in the above-captioned case (the “Debtor”), will move on Tuesday, April 30, 2024 at 10 a.m. in the forenoon, before the Honorable Christine M. Gravelle, U. S. Bankruptcy Judge, at the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608 for an Order reclassifying the claim filed on behalf of Jersey Shore Anesthesiology Associates from a secured claim to an unsecured claim.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the accompanying Objection to Claim in support of said Motion.

PLEASE TAKE FURTHER NOTICE that in accordance with Local Rule 9013-1(f) of the Rules of Procedure governing the practice before the United States Bankruptcy Court for the District of New Jersey, the Debtors waive oral argument of this motion if no objection

is filed and will not appear unless required by the Court to appear or an objection is filed. This motion may be deemed uncontested if no one files written responses and serves same on counsel for the moving party or more.

A proposed form of Order also accompanies this Motion.

Broege, Neumann, Fischer & Shaver, LLC
Attorneys for Debtor

BY: /s/ Timothy P. Neumann
TIMOTHY P. NEUMANN

Dated: March 25, 2024